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C. REMARKSClaim Rejections – 35 U.S.C. § 102(b)

Claims 6 and 7 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Boucher et al., U.S. Patent No. 5,884,246. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed Cir. 1987). Furthermore the reference must be an enabling disclosure of each and every element as set forth in the claim. *In re Hoeckma*, 158 USPQ 596, 600 (CCPA 1968); *In re LeGrive*, 133 USPQ 365, 372 (CCPA 1962). Because the Examiner does not show that Boucher teaches or suggests each and every element of claims 6 and 7 or enables each and every element of these claims, these claims are not anticipated. The rejection should be withdrawn, and the claims should be allowed.

As will be shown below, Boucher does not teach or suggest an automatic translation tool and a method for translating a document as claimed in the present application. Claims 6 and 7 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually, and request reconsideration of claims 6 and 7.

Concerning Examiner's rejection of claims 6 and 7, Applicants respectfully submit that Boucher does not anticipate the invention of Applicants' claims 6 and 7 because Boucher does not teach expressly or inherently the elements of claims 6 and 7, or enable the elements of claims 6 and 7. Specifically, Boucher does not teach or suggest the claimed element "means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation" as claimed in claim 6, and the corresponding method claim 7.

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Examiner's rejection of Applicants' claims 6 and 7 stated that "Boucher recites:

Means for receiving text in a first language;

Means for automatically translating the received text into translated text; and

Means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation"

wherein the "inserted translation parameter indicating translation type, Col. 13, Lines 41-53, which would include the machine translation type noted above". Applicants respectfully traverse Examiner's rejection, in particular with respect to the third element "means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation"

In the teaching by Boucher a "translation parameter" is specified via the user interface when requesting the translation, wherein the "translation parameter which is to be applied to the **original communication** (Step 240). Included among the preferred translation parameters are: the destination address of the original communication; the type of translation to be performed on the original communication; the language of the communication to be translated; the language which the communication is to be translated into; whether a copy of the translation should be dispatched back to the sender for

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confirmation and/or modification; whether a copy of the final translated communication should be dispatched to the sender, and any other instruction regarding the translation which is desired.” (Col. 13, Lines 41-53). Thus, the “translation parameter” as taught by Boucher indicates translation limitations that are dispatched to, and to be carried out by the translation site (Col 14, Lines 24-26), wherein these limiting “translation parameters” are specified by the user requesting the translation, and wherein these “translation parameters” are “to be” applied to the original communication prior to performing the translation. Boucher teaches away from Applicants’ claimed invention since in the present invention the indication is inserted in the translated communication, not the original communication. Boucher does not teach the present invention as claimed, and in particular in the third element of claim 6 where “means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation,” where the inserted indicator is associated with resultant translated text.

Boucher further teaches away and therefore Claim 6 is not anticipated by Boucher because Boucher requires that “the process of translation is transparent to the recipient of the communication” wherein “the recipient is unaware from the message itself that the sender did not originate it in the language in which the recipient received it” (Col 10, Lines 25-29). This teaches away from indicating anything about a translation that has taken place. Thus, Boucher

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does not anticipate Applicants' claim element "means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation", thus informing the recipient that a translation occurred, and thus indicating that the sender of the original message did not originate it in the language in which the recipient received it.

Therefore, the claimed element "means for inserting an indication associated with the translated text indicating at least one of i) that a further translation will be made a different time, ii) that the associated text was translated using automatic translation, iii) that the associated text is a draft translation" and the corresponding method as claimed in the present application are not taught nor suggested by Boucher.

Thus, in light of the above claim not being anticipated by Boucher, Applicants respectfully request allowance of means claim 6 and corresponding method claim 7.

Claim Rejections – 35 U.S.C. § 103

Claims 1-5 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Lubkin et al (U.S. Patent 5, 339, 435) in view of Boucher et al. Applicants respectfully traverse each rejection. Applicants respectfully submit that neither Lubkin nor Boucher, either alone or in combination, teaches or suggests Applicants' claimed invention.

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To establish a prima facie case of obviousness, three basic criteria must be met.¹ First, the combination must teach or suggest all of Applicants' claim limitations.² Second, there must be a suggestion or motivation to combine the references.³ Finally, there must be a reasonable expectation of success in the combination.⁴

Lubkin and Boucher

The combination of Lubkin and Boucher cannot establish a prima facie case of obviousness because the proposed combination does not teach or suggest each and every element of claims 1-5, the combination teaches away from the claimed invention, there is no suggestion or motivation to make the proposed combination, there is no reasonable expectation of success in the proposed combination, Lubkin is not analogous art and therefore cannot be properly combined, and the combination of Lubkin and Boucher would destroy the purpose of Boucher, thereby further making the combination improper.

The Combination Of Lubkin and Boucher

Does Not Teach or Suggest all Of Applicants' Claim Limitations

The combination of Lubkin and Boucher does not teach or suggest all of Applicants' claim limitations.

The Lubkin patent is directed to a method and apparatus for providing a heterogeneous configuration management software tool, (Col. 1, Lines 60-64) wherein the software tool "enables building software systems on itself or another computer in the network supporting the same or different type of binaries." (Lubkin, Col. 3, Lines 65-68).

¹ Manual of Patent Examining Procedure §2142.

² *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974).

³ *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991).

⁴ *In re Merck & Co., Inc.*, 800 F.2d 1091, 1097, 231 USPQ 375, 379 (Fed. Cir. 1986).

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The Boucher patent is directed to a system and method for transparent translation of electronically transmitted messages. (Boucher Col. 1, Lines 8-14).

It is respectfully submitted that neither Lubkin nor Boucher, considered alone or in combination, teach or suggest the presently claimed invention.

The following discussion considers elements of Applicants' Claim 1 which Applicants submit are not taught or suggested by the references cited in Examiner's rejection with respect to claim 1.

Neither Lubkin Or Boucher, Alone Or In Combination Teach Or Suggest Translating Given Changes To The Initial Level Into The At Least One National Language Version Using A Lower Quality Translation And Taking A Second Amount Of Average Translation Time Per Word Less Than The First Amount Of Average Translation Time Per Word.

Examiner's rejection admits that "Lubkin does not specifically suggest translation types for performing a high quality initial translation and a lower quality translation if a document changes." The Examiner states that "Boucher recites...translating given changes to the initial level into the at least one National Language version using a lower quality translation and taking a second amount of average translation time per word less than the first amount of average translation time per word" and that this teaches "machine translation" (Office Action, page 4, paragraphs 1-4). Applicants respond that Boucher also does not teach or suggest the claimed element "translating given changes to the initial level into the at least one National Language version using a lower quality translation and taking a second amount of average translation time per word less than the first amount of average translation time per word."

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In particular and in contrast to the present invention, Boucher does not teach or suggest translation "of given changes to the initial level" since Boucher is concerned with translating "to display the translated message to the recipient" (Col 9, Lines 37, 38) and not with translating changes to an already translated message "using a lower quality translation" where the initial level is "at least one National Language version" as claimed by Applicants. Boucher teaches instead that "a human translator reviews the machine translation performed by the translation machine" (Col 12, lines 35-37), and "in other preferred embodiments, ... a human translator will perform all of the translation" (Col. 12, Lines 37-39). Nowhere does Boucher teach or suggest "translating given changes to the initial level of the at least one National Language version using a lower quality translation." Boucher teaches away from the present invention since Boucher translates the entire message and is not translating the "changes" using a lower quality translation. Thus, Boucher does not teach or suggest Applicants' claimed element, and as admitted by Examiner, Lubkin also does not teach this claim element. Thus, Applicants submit that neither Lubkin nor Boucher, nor the combination of Lubkin and Boucher, teach or suggest this claim element. Therefore, it is respectfully submitted that the Examiner has failed to establish a *prima facie* case of obviousness under 35 USC 103(a) with respect to Claim 1, and allowance of Claim 1 is respectfully requested.

Neither Lubkin or Boucher, Alone Or In Combination Teach Or Suggest Indicating, Using An Indication, In The At Least One National Language Version At Least One Of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time.

Lubkin does not teach or suggest the claimed multi-purpose action "indicating, using an indication, in the at least one National Language version at least one of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation

of the lower quality translation will be made available at a later time” as claimed in the present application.

Furthermore, in the Boucher teaching “the process of translation is transparent to the recipient of the communication. That is, the recipient is unaware from the message itself that the sender did not originate it in the language in which the recipient received it” (Col 10, Lines 25-29). Therefore, any possible combination of Lubkin and Boucher that teaches or suggests “transparent translation” teaches away from “indicating, using an **indication** in the at least one National Language version at least one of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time” as claimed by Applicants. Since Boucher teaches “transparent translation” and not one that informs the user as claimed in the present application, the combination of Lubkin and Boucher does not teach or suggest Applicants’ claimed invention. Teaching away from the claims is a *per se* demonstration of lack of prima facie obviousness. *In re Dow Chemical Co.*, 837 F.2d 469, 5 U.S.P.Q.2d 1529 (Fed. Cir. 1988); *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988); *In re Neilson*, 816 F.2d 1567, 2 U.S.P.Q.2d 1525 (Fed. Cir. 1987).

Neither Lubkin Or Boucher, Alone or in Combination Teach or Suggest First Delivering The Document With The Given Changes In The Native Language And In The At Least One National Language Having The Indication.

Examiner’s rejection of Claim 1 states that “file containing translation information featuring a flag indicating whether the file is permanent” (Lubkin Col. 8, Lines 31-59) teaches or suggests “first delivering the document with the given changes in the native language and in the at least one National Language having the indication” as claimed by Applicants in the present application. In addition to the preceding Applicants’ response, Applicants respectfully submit that featuring a flag to indicate whether a “file is

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permanent” or not does not teach or suggest “first delivering the document with the given changes in the native language and in the at least one National Language having the indication” as claimed by Applicants. Furthermore, in Lubkin, the determination whether a file is permanent or not does not teach or suggest delivery of any file. Therefore, Lubkin does not teach or suggest Applicants’ claimed invention.

Boucher teaches that “the process of translation is transparent to the recipient” (Col 10, Lines 25, 26) and nowhere does Boucher teach or suggest transmittal of a “native language” document as claimed by Applicants. Boucher also does not teach or suggest transmittal of a National Language version of a document having an indication as claimed by Applicants.

Therefore, neither Lubkin or Boucher, alone or in combination teach or suggest Applicants’ claimed invention and allowance of Claim 1 is respectfully requested.

Lubkin and Boucher Are Not Analogous Art

Examiner’s rejection of Claim 1 stated that “Lubkin and Boucher are analogous art because they are from a similar field of endeavor in language translation.” Applicants respectfully traverse Examiner’s rejection of claim 1, submitting that Lubkin’s field of endeavor is not language translation. A prior art reference is analogous if the reference is in the field of applicants endeavor or, if not, the reference is reasonably pertinent to the particular problem with which the inventor is concerned. *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992).

In the Lubkin teaching, the use of flag indicators has nothing to do and is not analogous art in the field effecting Language Translation as in Boucher, and Lubkin’s teaching is not reasonably pertinent to the particular problem with which Boucher is concerned. Lubkin’s “software configuration and management” field of endeavor teaches “the term ‘building a

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system' refers to creating the product from its source materials and includes translating (i.e., **compiling, binding, formatting or otherwise manipulating**) source files and/or element versions" (emphasis added) (Col. 4, Lines 14-18). The definition and meaning of "translating" as used within the context of the Lubkin teaching does not teach or suggest the concept "**translating a document into a foreign language**" as in Boucher and Applicants' invention. Instead, Lubkin teaches a different "translator" as in "FIG 2, to begin a **system build** the user also provides a description of the version and translator options desired to be used **during building** of each component in the system model 16" (emphasis added) (Col. 7, Lines 35-38), and does not teach or suggest "translating into a foreign language" as the field of endeavor of Boucher.

The Lubkin invention teaches "a translation rule to reference the same tool or translator regardless of which foreign builder 13 the translation rule is running on." (Col 9, Lines 55-59). Lubkin is not concerned with "National Language translation". Lubkin uses the term "translation" that has a completely different definition and in a completely different context from the meaning and use in Boucher and in the present application. Lubkin teaches and uses "translation" in the context "where the subject pathname matches part of an entry, the OS manager 39 uses the corresponding **translation, i.e., substitute text string or regular expression, of that entry in the subject pathname**" (emphasis added) (Col. 16, Line 68 - Col 17, Line 8). Nowhere does Lubkin use or suggest the term "translation" within the meaning or context of Language translation.

Lubkin is not analogous art. Lubkin teaches a heterogeneous software configuration management method and apparatus. (Col. 1, Line 65-Col 2, Line 6) Analysis of the Lubkin patent teaches about managing software development, installation and configuration systems. (Col. 1, Line 65-Col 3, Line 15) Although the Lubkin patent includes the terms "translation" and "foreign" the definition and use of these terms are not within the context of language translation. Lubkin uses "translation" and "foreign" to teach "additionally, the present invention enables a

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translation rule to reference the same tool or translator regardless of which foreign builder 13 the translation rule is running on" (Col 9, Lines 55-59). Analysis of the use of these terms renders their contextual meaning, wherein "this is accomplished in one of the three following manners:

- i) A % vswitch term is employed before the **translator** pathname. However, in the case where the **translator** invokes another **translator**, the **translator** pathname is preferably not preceded with the % vswitch term unless the **translator** accepts options that allow specification of the pathname at which subordinate tools are located. ... Consider, for example, /bin/cc, which invokes the preprocessor /usr/lib/cpp. Although % vswitch/bin/cc refers to a C compiler stored on an Apollo workstation, the preprocessor that the c compiler invokes /usr/lib/cpp has a root-relative pathname, and thus, refers to the **preprocessor stored on the foreign builder 13.**" (emphasis added) (Col 9, Line 59-Col 10, Line 6).

Thus, Lubkin's use of "translator" refers to tools such as the C compiler, and the use of "foreign" refers to another builder system, and not as disclosed and used by Boucher within the context of National Language translation.

Therefore, Lubkin is not analogous art and the combination with Boucher is improper.

In Bucher, "the field of the invention...relates to systems and methods for...translating messages from a first language to one or more different languages" (Col. 1, Lines 6-9). Applicants submit that the Lubkin and Boucher are not analogous art because Lubkin is not in the art of language translation. The Lubkin reference is not reasonable pertinent because the matter with which it deals does not commend itself to an inventor's attention in considering National Language Translation. As such, the combination of Lubkin and Boucher is improper. Even if assuming that the combination could be made, the combination still does not teach or suggest every element as claimed above. Therefore, neither Lubkin or Boucher, alone or in

combination teach or suggest Applicants' claimed invention and allowance of Claim 1 is respectfully requested.

Boucher or Lubkin, Alone Or In Combination Teaches Away Applicants' Claimed Invention

Boucher teaches that once the human translation step is performed, that renders the translated communications ready for transmission (Col. 3, Lines 37-41). Thus, teaching away from the present claimed method of further applying "lower quality translation" to "given changes" from an already existent "initial level" language version which may be already composed of lower quality translation and higher quality translations. In the Boucher teaching, once a translation is complete, no changes are anticipated or performed, thus teaching away from "translating given changes to the initial level into the at least one National Language version using a lower quality translation and taking a second amount of average translation time per word less than the first amount of average translation time per word" as claimed by Applicants.

Lubkin teaches a flag to indicate whether the object is permanent. (Col. 8, Lines 34-35).

Any proposed combination of the teachings of Lubkin and Boucher as suggested by Examiner would teach away from the Claimed invention since Boucher teaches that once a translation is complete, no given changes are performed on the original translation.

Boucher teaches at Col 3, Lines 43-49, "After translation, the translated communication is conveyed via the computer network to arrive at the site designated by the destination address where it is received and reproduced in a humanly perceptible manner such that an intended recipient can comprehend the contents of the translated communication." (emphasis added). The method of translation is "transparent translation" (Col 2, Line 7),

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so that "the translation of electronically transmitted messages ... is unobserved by the recipients." (Col 15, Lines 46-47). Therefore, Boucher teaches that after a completed translated message is transmitted to a user, the user is unaware that translation took place. Thus, Applicants submit that Boucher teaches away from "indicating, using an indication, in the at least one National Language version at least one of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time" as claimed in the present application.

Boucher performs translation in such a manner that "provides translation of electronically transmitted messages directed to one or more recipients which is **unobserved by the recipients**" (emphasis added) (Col 15, Lines 45-47), and "**without any intervention on the part of the recipient**" (emphasis added) (Col 15, Lines 51-54). Thus Boucher teaches away from Applicants' present invention where the recipient is made aware of the translation "indicating, using an indication" as claimed by Applicants.

Boucher teaches away from "indicating, using an indication, in the at least one National Language version at least one of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time." Boucher teaches instead that "any response from the recipient" may also use "the feature of automatically translating any response" which is "translated at the translation site" (Col 9, Lines 46-67) such that the original recipient is completely unaware of the response message being translated into the original sender's language, thus teaching away from the present invention which indicates that translation took place, using an indication as claimed by Applicants.

Any proposed combination of the teachings of Lubkin and Boucher as suggested by Examiner would teach away from the Claimed invention since Boucher requires a "transparent translation" without any indication to indicate the level of quality of the

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translation, and that “the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time.”

Boucher teaches away from “first delivering the document with the given changes in the native language and in the at least one National Language having the indication.” Instead, Boucher “provides... translation of electronically transmitted messages directed to one or more recipients which is **unobserved** by the recipients... **without any intervention** on the part of the recipient” (Col 15, Lines 41-54). Boucher teaches that it is important a recipient of a translated message be unaware that the translation took place, (Col. 10, Lines 29-38) and that no intervention is required on the part of the recipient. Thus, Boucher teaches away from Applicants’ present invention which informs the recipient that translation took place, by “first delivering the document with the given changes in the native language and in the at least one National Language having the indication.”

Furthermore, Boucher teaches that the native language document is delivered to the translation site (Col 9, Line 57-Col. 10, Line 9), and not to the recipient of the communications (Col. 10, Lines 25-35), thus, teaching away from Applicants’ claimed invention of first delivering the document with the given changes in the native language and in the at least one National Language having the indication.

Any proposed combination of the teachings of Lubkin and Boucher as suggested by Examiner would teach away from the Claimed invention since Boucher requires a “transparent translation” without any indication of first delivering the native document as claimed by Applicants.

No Suggestion Or Motivation To Combine Or Modify Lubkin Or Boucher

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To establish a prima facie case of obviousness, there must be a suggestion or motivation to modify either Lubkin or Boucher. *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991).

Boucher's primary objective provide **transparent translation** (Col 2, Lines 6-9), which is **unobserved by the recipients** (Col 15, Lines 45-47), and Lubkin teaches a **flag to indicate** whether the object is permanent (Col. 8, Lines 34-35). There is no motivation to modify or combine Boucher with Lubkin to produce Applicants' claimed invention because the proposed combination would change the principle of operation of Boucher, and would render Boucher unsatisfactory for its intended purpose.

Since Boucher teaches translation that is unobserved by the recipients, which if combined with the Lubkin teaching of a flag to indicate a translation property, such flag would inform the translation recipients that translation occurred, thus violating Boucher's principle of operation of translation transparency, and rendering the teaching of Boucher unsatisfactory for its intended purpose because the **recipient would know that translation occurred**. *In Re Tatti*, 270 F2d 810, 123 USPQ 349 (CCPA 1959), *in re. Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

There is no motivation to modify either Lubkin or Boucher to teach Applicants' claimed invention. The art of Lubkin is not National Language translation as used by Boucher, but instead deal with software configuration (Lubkin, Col. 2, Lines 60-64). In Boucher "a primary object... provide **transparent translation** of transmitted messages" (emphasis added) (Col 2, Lines 6-9). Boucher's primary objective is the transparency of the translation, which teaches away from Applicants' claimed invention. Therefore, Applicants submit that there is no suggestion or motivation to combine or modify Lubkin or Boucher to produce Applicants' claimed invention because the combination of the teachings of Boucher and Lubkin render Boucher unsatisfactory for its intended purpose.

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No Reasonable Expectation Of Success In The Combination Of Lubkin And Boucher

The combination of the teachings of Lubkin and Boucher yields no reasonable expectation of success. A proposed system according to the combined teachings of Boucher and Lubkin, in which Lubkin "provides configuration managing means for building a user-desired software system" (Col 1, Line 67-Col. 2, Line 1) wherein "a flag indicates whether ... the object is permanent" (Col. 8, Lines 34-35) and combining into that system the teaching of Boucher where "importantly...the process of translation is transparent to the recipient... That is, the recipient is unaware...that the sender did not originate it in the language in which the recipient received it" (Boucher, Col. 10, Lines 25-37) can not possibly yield a successful translation as claimed by Applicants "indicating, using an indication, in the at least one National Language version at least one of i) that the indicated text is not to be regarded as the final translated text, and ii) a further translation of the lower quality translation will be made available at a later time." The teaching by Boucher would prevent acknowledging to a recipient via a flag or any indication that translation took place. Thus, no reasonable expectation of success to produce Applicants' invention could be achieved by combining the teachings of Lubkin and Boucher.

Therefore, it is respectfully submitted that the Examiner has failed to establish a *prima facie* case of obviousness under 35 USC 103(a) with respect to claim 1. Allowance of claim 1 is respectfully requested.

Claims 2 and 3

Responsive to Examiner's rejection of dependent Claims 2 and 3, Applicants respectfully submit that the Examiner has not proven *prima facie* obviousness for Claim 1, and therefore dependent claims 2 and 3, which depend from Claim 1 should be allowed.

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Claims 4 and 5

Applicant's response to Examiner's rejection of Claims 4 and 5 is similar to Applicants' response made for Claim 1 concerning the similar elements of claim 4. In addition, Applicants respectfully submit that Boucher does not teach or suggest any "automatic translation" that would inform the recipient of the translation that translation took place, by indicating in the at least one National Language version that a further translation of the automatically translated changes will be made available at a later time." Instead, Boucher makes the complete translation process "unobserved by the recipients" and "without any intervention on the part of the recipient" (Col 15, Lines 41-54), thus teaching away from the invention claimed in Claims 4 and 5.

Therefore, Applicants respectfully submit that the Examiner has not proven prima facie obviousness for Claims 4 and 5, and Claims 4 and 5 should be allowed.

Claim 8

Responsive to Examiner's rejection of computer program method Claim 8, Applicants respectfully submit that the corresponding response above for method Claim 7 demonstrates that Claim 7 is not anticipated by Boucher, and therefore, the corresponding computer program method means Claim 8 should be allowed.

Conclusion

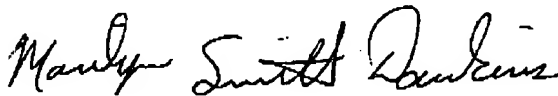
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In view of the foregoing, withdrawal of the rejections and the allowance of the current pending claims is respectfully requested. If the Examiner feels that the pending claims could be allowed with minor changes, the Examiner is invited to telephone the undersigned to discuss an Examiner's Amendment.

Respectfully submitted,



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